



## **Summary of Bosham Association's comments on why Policy A11 should be removed from the local plan**

### **Wastewater**

1. There is insufficient wastewater treatment capacity, available to support this number of houses. Southern Water recently indicated they cannot connect all of the housing in the proposed Bosham Highgrove estate to the wastewater network because of capacity constraints. This brings the site into conflict with Policy NE16.
2. Southern Water's Drainage and Wastewater Management Plan (DWMP) estimates that the cost of improvement works to stop the discharges into the harbour will be £9,405,000 and none of these measures is guaranteed. Even the short-term measures will take until 2030 to complete if they are completed at all.
3. All of the options in Southern Water's DWMP to increase capacity for wastewater treatment at Bosham Wastewater Treatment Works are listed as medium and long-term meaning work will not begin until 2030 and may not be completed until 2050 if at all.
4. The Bosham outflow pipe was the site which discharged for the longest amount of any of the thirteen pipes which discharge into Chichester Harbour during 2022-2023. This shows the sewerage network cannot cope with further strain on the wastewater infrastructure in Bosham.
5. Wastewater outflows into Chichester Harbour amounted to 19.4% of the year in 2022 further housing in the district will make this problem worse.

### **Roads and Transport**

6. There is no capacity within the strategic road network to accommodate the increase in housing and no guaranteed upgrade planned. This is confirmed in Stantec's Chichester District Council Local Plan Transport Assessment (Jan 2023) at points 11.2.1. The junctions on the Chichester stretch of the A27 are all 'well over capacity' already. The proposed Local Plan makes it clear that there is no guaranteed upgrade to any of the A27. (Point 8.5)
7. 84% of planned housing will be along the East-West corridor (Policy H1). All of these dwellings will lie along the already 'well over-capacity' A27 bypass junctions. The Fishbourne Roundabout has been identified by Stantec as the junction most in need of mitigation and improvement but a further 1645 houses have been allocated in the plan along the A259 corridor and another 1600 allocated in the land West of Chichester with the majority of these dwellings likely to access the A27 via the Fishbourne Roundabout. Peak time delays to access the Fishbourne Roundabout are modelled to be 29 minutes. This will exacerbate air pollution in the villages of Fishbourne and Bosham and drive traffic onto minor routes which are not designed to cope with heavy traffic.
8. There is only one train per hour which stops at Bosham Station. Having access to a train station does not automatically equate to good public transport links.

9. The 700 bus service has recently changed from 10 minutes to 30-minute intervals and after 7 pm there is only one bus per hour. This is, again, not equal to 'good public transport' links.

### **Pollution**

10. There are insufficient plans in place to offset the nitrates for the site. SDNPA has made it clear that they cannot guarantee further land for nitrate offset at Chilgrove to allow this development to take place. This brings the site into conflict with Policy NE19.
11. There is no primary school provision for the site and the schools proposed are not within walking/cycling distance or sites that have public transport links which will put more vehicles on the roads and exacerbate air pollution. This brings the site into conflict with Policies NE20 and T1.
12. There is only one access point for vehicles onto the A259. This will increase air pollution as traffic idles to enter and exit the site. This brings the site into conflict with Policy NE20.

### **Flood Risk**

13. Flood risk assessments are arguably out of date with some aspects relying on data from 2014 and the data available does not guarantee that the site allocation will not raise the flood risk at the neighbouring settlement along Brooks Lane. The National Planning Policy Framework (NPPF) makes it clear that new development should not increase flood risk elsewhere.
14. The SuDs planned for the site have not been used before by Chichester District Council and there is no end-user identified to maintain them for the lifetime of the development. They have been positioned near public open space and may, at times, contain deep water. There has been no safety risk assessment carried out.

### **Settlement Boundaries**

15. The site allocated at policy A11 is wholly outside of the Bosham settlement boundary and therefore according to the plan development should be limited because it is classified as countryside. The choice of this site is completely in conflict with Policy NE10.

### **Character of Village**

16. The site will mean an increase in village size of 26% (2.4 people x 295 dwellings = 708 additional people. The current population of Bosham is 2694 (2021 census) 708/2694 equals an increase in village population of 26% This is not sustainable for the amenities in the village. A population increase of 26% will change the character of the village. The NPPF states that development must not adversely affect the character, quality, and amenity of an area. This is echoed in Point 3.3 of the proposed local plan.

### **Local Voice and Consultee Reservations**

17. There is large-scale local opposition to the development of this site with hundreds of families submitting letters of objection submitted during the planning permission stage.
18. The Bosham Association represents its 435 members and has only received comments in opposition to the development of the site and none in support of it.
19. Development of the site is not favoured by any of the local parish councils, (Bosham, Chidham and Hambrook, Fishbourne and Funtington). All have raised serious objections to the development proposed.

20. Development of the site is not supported by Chichester Harbour Conservancy. (Consultee comment BO/20/00571/FUL dated 9 February 2023)
21. SDNPA, National Highways, Southern Water, Network Rail, The Environment Agency and Natural England have both raised reservations about the site or suggested mitigation measures needed or further considerations be made.
22. Michael Gove has given a Ministerial Statement and there has recently been a consultation on changes to the NPPF. It is evident from this that a greater say for local communities is a key part of the new policies. This proposed development is hugely unpopular.

#### **Lack of Amenities**

23. There is a proposed community hall for this development where there is no additional need for one and no end-user has been identified to maintain it. We currently have 4 halls which can be used within walking distance.
24. Allotments have been proposed as part of the development and at the consultation stage, these were specifically mentioned as something that was not wanted as an option.
25. The number of houses proposed is not in the Neighbourhood Plan.
26. The GP surgeries in the area are all heavily oversubscribed. The Bosham Practice is only open part-time. No consideration seems to have been given to this.
27. There is no primary school provision in the village for this site as the one-form entry primary school is already at capacity.

#### **Loss of Agricultural Greenfield Land**

28. The site is viable and productive grade 1 and 2 agricultural land which has been used until the last year and should therefore be protected from development. (Policy NE10)
29. There is derelict and abandoned land in the area available to be built on which has not currently been considered. The French Gardens, Southfield, Delling Lane, Knapp Farm and Swan Field all appear to have been excluded from the Chichester District Council Brownfield Site Register. These sites have been excluded because they are outside of the settlement boundary but the whole of the site proposed in Policy A11 is also outside of the settlement boundary. So this approach seems to make no sense. The NPPF states that brownfield land should be used in preference to agricultural or undeveloped land.
30. The site has open countryside views between the SDNP and AONB which should afford it greater protection. The SDNPA do not think this site is suitable. The application is not compliant with Paras 174-176 of the NPPF. It is located directly adjacent to the AONB and the development would not protect and conserve the landscape and the long-distance views of the SDNP.
31. The site is the only space where there is open farmland on both sides of the A259. This will lead to perceived coalescence between Bosham and Fishbourne.

#### **Loss of Biodiversity**

32. There is mature hedgerow to the rear of the site which is going to be disturbed during the building process.

33. There is no proven 10% gain in biodiversity or detail about how this will be achieved or monitored. (Policy NE5)

34. The site will mean wildlife corridors between SDNP and AONB are squeezed.

[REDACTED]  
9 March 2023

Dick Pratt and Jenny Morris. (Co-Chairs).  
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